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UNITED STATES BANKRUPTCY COU SOUTHERN DISTRICT OF NEW YORK		
In re:  AZG Sales Inc.  Debtor		Case No. 24-22204 shl Chapter 11
	X	

## **DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

Charles Wertman, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury:

- 1. I am the proposed attorney for AZG Sales Inc. the Chapter 11 Debtor (hereinafter referred to as the "Debtor"). I am a member of the Bar of the State of New York and admitted to practice law in the United States District Court for the Southern District.
- 2. I submit this declaration in response to the Trustee's Motion to Dismiss this Chapter 11 case and respectfully represents as follows:
- 3. Except for there Monthly Operating Reports which are in the midst of preparation. All of the missing documents and requested information has been submitted.
- 4. Given the above, the Debtor respectfully submits that the Motion to Dismiss should be denied.

WHEREFORE, Debtor respectfully requests that Trustee's Motion to Dismiss this Chapter 11 case be denied in its entirety, and for such further relief as this Court deems just and proper.

Dated: Rockville Centre, New York June 7, 2024 Law Offices of Charles Wertman, P.C. Attorneys for Debtor AZG Sales Inc.
By: /s/ Charles Wertman, Esq.
Charles Wertman, Esq.
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